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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.
23 **DECLARATION OF PATRICK
24 SCHMIDT IN SUPPORT OF PLAINTIFF
25 WAYMO LLC'S ADMINISTRATIVE
26 MOTION TO FILE UNDER SEAL
27 PORTIONS OF ITS REPLY IN SUPPORT
28 OF ITS MOTION FOR RELIEF FROM
NON-DISPOSITIVE PRETRIAL ORDER
OF MAGISTRATE JUDGE (DKT. 731)**

29 UBER TECHNOLOGIES, INC.;
30 OTTOMOTTO LLC; OTTO TRUCKING
31 LLC,

32 Defendants.

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45 CASE No. 3:17-cv-00939-WHA

46 SCHMIDT DECLARATION ISO DEFENDANTS' ADMINISTRATIVE MOTION TO SEAL

1 I, Patrick Schmidt, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
 7 Seal portions of its July 7 Reply in Support of its Motion for Relief from Non-Dispositive Pretrial
 8 Order of Magistrate Judge (Dkt. 731) (the “Reply”), filed concurrently herewith (the “Administrative
 9 Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Reply	Highlighted Portions	Defendants

12 3. The highlighted portions of Waymo’s Reply contains references to information that
 13 Defendants have designated as confidential and/or highly confidential.

15 4. Waymo expects Defendants to file one or more declarations in accordance with the
 16 Local Rules.

17 I declare under penalty of perjury under the laws of the State of California and the United
 18 States of America that the foregoing is true and correct, and that this declaration was executed in Los
 19 Angeles, California, on July 7, 2017

20 By /s/ Patrick Schmidt
 21 Patrick Schmidt
 22 Attorney for WAYMO LLC

23 **SIGNATURE ATTESTATION**

24 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
 25 filing of this document has been obtained from Patrick Schmidt.

26 /s/ Charles K. Verhoeven
 27 Charles K. Verhoeven